

REMARKS

By this Amendment, claim 1 is amended, no new claims are added and no claims are cancelled.

Currently claims 1-21 are pending. In view of the above amendments and following remarks reconsideration of the rejections are respectfully requested by the Applicants.

Applicants appreciate the indication of allowable subject matter in claims 2-7, 12-15, and 19-20, which currently stand objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims.

I. Rejections Under 35 U.S.C. §102(e)

The Examiner has rejected claims 1, 8-11, 16-18 and 21 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,661,782 to Mustajarvi et al. (Mustajarvi). This rejection is respectfully traversed.

As noted above, amended independent claim 1 positively recites *inter alia*, a method of managing access network protocol context in an access system including, opening at least one access network protocol context at a first access node to activate a packet data address and make the packet data address known to the first gateway node in order to establish a connection between one of said plurality of mobile nodes and said first gateway node. These claimed features are amply supported by the embodiments disclosed in the specification.

Applicants submit that, in dramatic contrast to the claim invention, Mustajarvi fails to teach or suggest, at least each and every element of claim 1, including the features identified above. That is, as best understood there is simply nothing in Mustajarvi that relates to the claimed macro mobility management that *operates through the access network protocol context and the gateway association*.

In the Office Action, the Examiner alleges that the GGSN (the gateway support node) anticipates the “access node” in the claims, and similarly that the SGSNs (general packet radio service support nodes), anticipate “access nodes serving said mobile nodes.” See, Mustajarvi, Fig. 1. This is simply not the case. First, in GPRS, that is a general packet radio service network, the network employs a general packet radio service gateway support node (GGSN) *to connect an operator’s network to other networks*. The general packet radio service network may employ a general packet radio service support node (SGSN) *to serve the mobile station* for example, when the mobile station represents a type of an access node. See, for example, Mustajarvi column 8, lines 7-8. Therefore, Mustajarvi, in at least the cited

passages, clearly fails to anticipate the claimed invention of claim 1. Clearly Fig. 1 of Mustajarvi, and by analogy, the entirety of the Mustajarvi disclosure, is distinguishable from Applicants claimed invention for at least the reasons discussed above.

Additionally, Mustajarvi clearly shows and describes a signaling interface that is located between SGSN and a virtual logical register VLR. This interface (gateway interface (Gs)) is located between the access node and the virtual logical register and is not any type of entity which would be applicable to either the structural or functional equivalent found within a macro mobility entity of applicants claimed invention. Therefore, contrary to the Examiner's assertions, the VLR interconnection with SGSN by a so-called signaling interface does not read on a "first mobility entity which is associated with said first gateway node and arranged to provide macro mobility management services to the mobile nodes while registered to a respective part of the access system". Instead, the virtual logical register provides a separate and distinguishable gateway interface (Gs) and does not provide any structural or functional equivalent to Applicants claimed invention. In fact, such an interface teaches away from the claimed macro level mobility management, and instead provides an impediment for controllability.

For at least these reasons, Applicants submit that none of the asserted sections of Mustajarvi, appear to anticipate Applicants claimed invention, or teach or suggest the claim combination of elements recited by at least amended claim 1. As such, claim 1 is clearly patentable. Furthermore, claim 1 more positively recites activity that takes place to activate a packet data address and make the packet data address known to the first gateway node, such additional activity is clearly distinguishable over any anticipated teaching found in Mustajarvi, since the packet data address will be determined and handled by the first gateway node in order to establish a connection between one of said plurality of mobile nodes and the first gateway node.

Therefore, Applicants submit that for at least the above reasons, Mustajarvi does not teach or suggest the claim combination of elements recited by amended claim 1, and similarly independent claims 11 and 18. As such, claims 1, 11 and 18 are clearly patentable. Because claims 2-10, 12-17 and 19-21 depend from claim 1, 11, and 18, they are at least patentable by virtual of their dependency as well as for their additional recitations. Accordingly, the immediate withdrawal of the prior art rejections of claims 1, 8-11, 16-18, and 21 is respectfully requested.

## II. Conclusion

All matters having been addressed and in view of the foregoing, applicants respectfully request the entry of this Amendment, the Examiner's reconsideration of this application and the immediate allowance of all pending claims.

Applicants' counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. If any point remains an issue with the Examiner which the Examiner feels may be best resolved through a personal or telephone interview, please contact the undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'W.D. Titcomb', is written over the printed name.

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